

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AEROGLOBAL CAPITAL MANAGEMENT,  
LLC., a Delaware Limited Liability Company,

Plaintiff,

C.A. NO. 02-CV-5311

v.

CIRRUS INDUSTRIES, INC., a Delaware  
Corporation, CIRRUS HOLDING COMPANY  
LIMITED, a Cayman Islands Corporation,  
CRESCENT CAPITAL INVESTMENTS,  
INC., a Delaware Corporation, FIRST  
ISLAMIC INVESTMENT BANK, E.C., a  
Bahrain Investment Bank, ALAN L.  
KLAPMEIER, DALE E. Klapmeier,  
PETER P. McDERMOTT, II, JOHN N.  
DYSLIN, SIMA GRIFFITH, MARWAN  
ATALLA, WILLIAM J. MIDON AND  
WILLIAM C. WOOD,

JURY TRIAL DEMANDED

Defendants.

**AFFIDAVIT OF SIMA GRIFFITH**

STATE OF MINNESOTA      )  
                            )  
                            ss:  
COUNTY OF HENNEPIN      )

Sima Griffith, being first duly sworn upon oath, states and alleges as follows:

1. I am a founding member of Aethlon Capital, LLC. I founded the company in 1996, and have continuously worked for the company since that time. Aethlon Capital is a small boutique investment banking firm based in Minneapolis, Minnesota. I submit this affidavit based upon personal knowledge.
2. I reside in Minneapolis, Minnesota. I have no homes or property in Pennsylvania.
3. Aethlon Capital's only office is in Minneapolis. It has no offices or employees in Pennsylvania. Aethlon does no business in Pennsylvania, nor does it advertise in Pennsylvania.

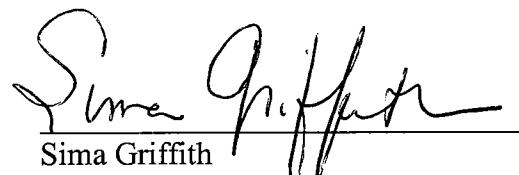
4. As a representative of Aethlon Capital, I worked to finalize an investment by Crescent Capital in Cirrus Industries. None of my discussions with Crescent or Cirrus were ever conducted in Pennsylvania. I have had no contact with Pennsylvania for any facet of Aethlon's work with Cirrus or Crescent.

5. I have had no contact with AeroGlobal Capital Management, LLC.

6. It is my understanding that counsel for AeroGlobal has asserted that I "attempted to evade service" of a complaint in this federal lawsuit. This is not true. I never attempted to evade service.

7. It is my understanding that AeroGlobal claims to have sent a registered letter to my home on November 8, 2002. Counsel for AeroGlobal took my deposition in May 2002, and they know that I am an investment banker. I usually am not home during weekdays, and instead I work during weekdays in my office in downtown Minneapolis. I never received a registered letter at my home, and I did not see any notice that the Post Office tried to deliver a registered letter on or around November 8. I do not recall receiving any postal notices at my home in the month of November 2002. As far as I know, AeroGlobal never tried to serve me at my office until mid-December 2002, when my assistant received a copy of a complaint mailed to my office.

FURTHER AFFIANT SAITH NOT.



Sima Griffith

Subscribed and sworn to before me  
this 31st day of December, 2002.

  
\_\_\_\_\_  
Notary Public

